

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HONG et al.

Plaintiff(s),

-against-

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

Civ. 25-cv-00⁹²²(LDH) (VMS)

City of New York et al

Defendant(s).

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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Pro Se Plaintiffs

For Defendant(s): Oluwaseun Adenire

- A. Do the parties request referral to the Court's ADR program? Yes: ☒ No: ☐
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: ☒ If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by July 11, 2025 Defendant(s) will respond by August 1, 2025
- D. Defendant(s) will answer or otherwise respond to complaint by June 27, 2025, if not yet done.

The parties will serve Rule 26(a)(1) initial disclosures by September 5, 2025, if not yet done.

The parties will serve initial document requests and interrogatories on or before October 6, 2025

Any joinder and/or amendments of the pleadings must be made by July 31, 2025

The parties will complete fact discovery by February 3, 2026

If the parties perform expert discovery, they will serve initial disclosures by N/A ;
initial expert reports by N/A ; and rebuttal expert reports on or before N/A .
All discovery, including expert depositions, will be completed by May 4, 2025 , and the parties
will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for
electronic discovery or confidentiality order: Confidentiality Order